

From: PLC [mailto:pinwheelglider@yahoo.com]
Sent: Friday, March 16, 2012 11:04 AM
To: Baskin, Kathleen (EEA)
Cc: Linda.Orel@maccweb.org
Subject: Comment on SWMI Framework proposal

Kathleen Baskin, P.E.
Director of Water Policy
Executive Office of Energy & Environmental Affairs
100 Cambridge Street, 9th floor
Boston, MA 02114
Email: kathleen.baskin@state.ma.us

Dear Ms. Baskin:

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012.

I appreciate the efforts that have been made to develop ecologically-based streamflow criteria. However using one standard for water withdrawals in all seasons and locations could lead to serious depletion of our water resources and ecological degradation. The State's proposal allows for uniform application of an annual "safe yield" figure throughout the year - allowing for excessive withdrawals during summer and fall low-flow periods - which could prove disastrously harmful to many streams. Lawn watering during dry summer periods can cause rivers to run dry, and the new DEP permitting system will not stop that. The proposed methodology also fails to address the location of water withdrawals, allowing for the possibility that the entire safe yield for large watersheds may be withdrawn in locations devastating headwater streams.

Protecting rivers that are healthy, and restoring those that are not, should be the goals of SWMI.

The state's permitting proposal would not establish clear goals and measurable benchmarks toward restoration for the 301 sub basins in Classes 4 and 5 (comprising 21 percent of the streams across Massachusetts). It would also fail to protect Classes 1-3 from severe seasonal depletion during summer and fall. Conservation, efficiency, and gradual shifting to alternative sources where necessary could protect wetlands and restore rivers while providing stable water supplies for people and economic growth. The proposed permit system will permanently grandfather existing excessive withdrawals and ensure continued river degradation.

Natural water resources are one of the gifts of living in a state like Massachusetts. However increasing use and pollution can degrade this valuable resource to the point that it is not sustainable for the next generation of people, plants and animals.

We need sustainable water management and we need it now. The state should revise the Framework to establish a process of gradual restoration of degraded rivers, streams

and wetlands. It should adopt a protective safe yield and permit system limiting water withdrawals consistent with the latest research.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from being pumped dry. We have to do better. Thank you for the opportunity to comment.

Sincerely,

Pat Cote
Member Hampden Conservation Commission